

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

MOOG INC.,

Plaintiff,

v.

Case No.: No. 22-cv-00187

SKYRYSE, INC., ROBERT ALIN
PILKINGTON, MISOOK KIM, and DOES NOS.
1-50,

**NOTICE OF MOTION TO
COMPEL WRITTEN
DISCOVERY RESPONSES
AND PRODUCTION OF
DOCUMENTS**

Defendants.

PLEASE TAKE NOTICE THAT, upon the accompanying Memorandum of Law, Motion to Compel Disclosures, Declaration of Rena Andoh, together with all exhibits to those declarations and affidavits, and upon the Complaint and all proceedings had herein, pursuant to the Court's minute order dated June 16, 2022 (ECF 164), Plaintiff Moog Inc. ("Moog") by and through their undersigned counsel, Sheppard, Mullin, Richter & Hampton, LLP, and Hodgson Russ LLP, hereby move this Court for an order requiring defendant Skyryse, Inc. ("Skyryse") to, within 7 days of the Court's order:

1. Skyryse to fully answer under oath the four questions set forth in Moog's June 16, 2022 letter to the Court and for which the Court ordered Skyryse to answer such questions;
2. Skyryse to produce all source code responsive to Moog's Interrogatory No. 1 to iDS;
3. Skyryse to produce the two categories of Moog documents identified in its Opposition brief filed on June 14, 2022 (ECF 156);

4. Skyryse to provide responses agreeing to produce all non-privileged documents responsive to Moog's RFPs Nos. 8-10, and production of such documents; and
5. Skyryse to provide complete and verified responses to Moog's Special Interrogatories Nos. 6-8.

Dated: New York, New York
June 30, 2022

**SHEPPARD, MULLIN, RICHTER &
HAMPTON LLP**

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